

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

RICKEY I. KANTER,	)	
	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No. 16-cv-01121
	)	
LORETTA ELIZABETH LYNCH,	)	
Attorney General of the United States, and	)	
BRAD SCHIMEL, Attorney General of the	)	
State of Wisconsin,	)	
	)	
Defendants.	)	
	)	

**DEFENDANT’S MOTION TO DISMISS**

Defendant, Loretta Lynch, in her official capacity as the Attorney General of the United States, hereby moves this Court for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing Plaintiff’s Complaint, and for such other relief as the Court may deem just and proper. The basis for this motion is set forth in the accompanying Memorandum of Law.

Dated: November 10, 2016

Respectfully submitted,

BENJAMIN C. MIZER  
Principal Deputy Assistant Attorney General

JOHN R. TYLER  
Assistant Branch Director

/s/ Michael L. Drezner  
MICHAEL L. DREZNER  
VA Bar #: 83836  
Trial Attorney, U.S. Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue, NW  
Washington, DC 20530

Telephone: (202) 514-4505  
Facsimile: (202) 616-8470  
*Counsel for Defendant*

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 10, 2016, a copy of the foregoing Motion was filed electronically via the Court's ECF system, which effects service upon counsel of record.

/s/ Michael L. Drezner  
Michael L. Drezner